

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

CAROLE AMES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:19-cv-04011-NKL
	)	
INTEGRITY HOME CARE, INC.,	)	
	)	
Defendant.	)	

**JOINT PROPOSED SCHEDULING ORDER/DISCOVERY PLAN**

Plaintiff Carole Ames and Defendant Integrity Home Care, by and through their respective counsel, present their Joint Proposed Scheduling Order/Discovery Plan pursuant to this Court's Order dated January 18, 2019.

1. The parties participated in a Rule 26(f) conference on January 23, 2019, by telephone: Andre E. Townsel, representing the Plaintiff, and Tina G. Fowler and Rachel A. Riso, representing the Defendant.

2. Motions to join additional parties shall be filed on or before February 20, 2019.

3. Motions to amend the pleadings shall be filed on or before February 20, 2019.

4. Discovery Plan.

a. Initial disclosures. The parties shall complete the initial disclosures required by Rule 26(a)(1) on February 6, 2019. The parties completed their Rule 26(f) conference three (3) business days after its removal to federal court and require the 14 days specified in Local Rule 26.1(a) in which to properly investigate and submit their initial disclosures.

b. Subjects on which discovery may be needed. The parties anticipate that discovery will be sought concerning Plaintiff's alleged claims of disability discrimination and

retaliation, alleged FMLA claims, and alleged wrongful discharge claims, as well as Defendant's defenses raised in its responsive pleading.

c. At this time, the parties do not anticipate any issues concerning disclosure, discovery, or preservation of ESI. All electronic information shall be produced in hard copy or as PDFs by the producing party in the manner in which it is kept in the ordinary course of business pursuant to FRCP 34.

d. At this time, the parties do not anticipate any issues concerning claims of privilege or protection of discoverable information; however, the parties will seek a joint order of protection regarding confidential, sensitive, and proprietary information.

e. The parties agree to the presumptive limits as set forth in the FRCP and will not conduct discovery in phases, or to limit the discovery to specific items.

f. Plaintiff's expert designations pursuant to Rule 26(a)(2) shall be filed on or before August 16, 2019.

g. Defendant's expert designations pursuant to Rule 26(a)(2) shall be filed on or before September 16, 2019.

h. All experts to be deposed on or before October 15, 2019.

i. Discovery motions shall be filed on or before November 18, 2019.

j. All discovery shall be completed on or before December 18, 2019.

k. The parties anticipate that a protective order will be requested in this case.

5. Dispositive motions shall be filed on or before January 17, 2020; Suggestions in Opposition shall be filed by February 7, 2020; Suggestions in Reply shall be filed by February 21, 2020.

6. Alternative Dispute Resolution. This case has been included in the Western District of Missouri's Mediation and Assessment Program. The parties will comply with the MAP Order issued January 18, 2019.

7. Trial date and length. The earliest date by which this case should be ready for trial is June 1, 2020, and should last 3 to 4 days.

8. Other matters. At this time, the parties are unaware of other matters deemed appropriate for inclusion in this Joint Scheduling Plan.

RESPECTFULLY SUBMITTED,

CAROLE AMES

/s/ Andre E. Townsel  
TOWNSEL LAW FIRM  
1701 East Woodfield Rd, Suite 900  
Schaumburg, Illinois 60173  
Telephone: (312) 772-5850  
Facsimile: (312) 278-0070  
[atownsel@townsellaw.com](mailto:atownsel@townsellaw.com)

*Counsel for Plaintiff*

INTEGRITY HOME CARE, INC.

s/ Tina G. Fowler  
BAIRD LIGHTNER MILLSAP, PC  
1901 South Ventura Avenue, Suite C  
Springfield, MO 65804  
Telephone: (417) 887-0133  
Facsimile: (417) 887-8740  
[tfowler@blmlawyers.com](mailto:tfowler@blmlawyers.com)

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 1<sup>st</sup> day of February, 2019, I electronically filed the above and foregoing document using the Court's e-filing system which sent notification to the following:

Andre E. Townsel, Mo Bar # 44639  
**TOWNSEL LAW FIRM**  
1701 East Woodfield Road, Suite 900  
Schaumburg, IL 60173  
(312) 772 5850  
(312) 278 0070  
[atownsel@townsellaw.com](mailto:atownsel@townsellaw.com)  
**Attorney for Plaintiff**

/s/ Tina G. Fowler

Tina G. Fowler